

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
SARAH CONNOLLY,	:	VIOLATIONS:
a/k/a “Sarah Jane Raup	:	18 U.S.C. § 656 (bank embezzlement - 4
Connolly Noll”	:	counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant SARAH CONNOLLY, a/k/a “Sarah Jane Raup Connolly Noll,” was employed with the First Union National Bank (“FUNB”) as a Vice President/Senior Trust Advisor and was responsible for overseeing customer trust accounts.
2. FUNB was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869-9.
3. Commerce Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 21140-1.

4. On or about May 7, 1999, in the Eastern District of Pennsylvania and elsewhere, defendant

**SARAH CONNOLLY,
a/k/a “Sarah Jane Raup Connolly Noll”**

being an employee of FUNB, the accounts of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869-9, did knowingly embezzle, abstract, purloin, and willfully misapply approximately \$3,964.00 of funds and monies intrusted to the custody and care of FUNB.

In violation of Title 18, United States Code, Section 656.

COUNT TWO

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein.

2. From on or about February 1, 2000, to on or about June 14, 2001, in the Eastern District of Pennsylvania and elsewhere, defendant

**SARAH CONNOLLY,
a/k/a “Sarah Jane Raup Connolly Noll”**

being an employee of FUNB, the accounts of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869-9, did knowingly embezzle, abstract, purloin, and willfully misapply approximately \$35,985.48 of funds and monies intrusted to the custody and care of FUNB.

3. Defendant SARAH CONNOLLY attempted to steal approximately \$14,485.48 by her fraudulent use of the FUNB debit card of “T.B.” to make ATM withdrawals, purchase food, clothing, jewelry, and other items for her personal use.

4. On or about the dates listed below, defendant SARAH CONNOLLY fraudulently used “T.B.’s” FUNB debit card to withdraw money from the FUNB CAP account of “T.B.,” totaling approximately \$14, 028.50:

<u>Date</u>	<u>Amount</u>	<u>Location</u>
02/01/00	\$600.00	WaWa, 1600 Walnut
04/07/00	\$600.00	Franklin Boulevard
08/24/00	\$600.00	112 South 9 th Street
10/09/00	\$601.75	Penrose Plaza

11/14/00	\$601.75	Penrose Plaza
11/24/00	\$601.50	1900 Market Street
11/26/00	\$601.75	Penrose Plaza
12/01/00	\$601.75	Penrose Plaza
12/11/00	\$601.75	Penrose Plaza
12/26/00	\$601.75	Penrose Plaza
01/11/01	\$601.50	201 South 18 th Street
01/16/01	\$601.50	201 South 18 th Street
01/30/01	\$701.50	19 th & Walnut Streets
02/05/01	\$701.50	19 th & Walnut Streets
02/15/01	\$701.50	19 th & Walnut Streets
03/29/01	\$701.50	19 th & Walnut Streets
04/04/01	\$601.50	704 Chestnut Street
04/12/01	\$600.00	112 South 19 th Street
05/21/01	\$701.50	19 th & Walnut Streets
06/07/01	\$701.50	19 th & Walnut Streets
06/11/01	\$701.50	19 th & Walnut Streets
06/14/01	\$201.50	Rite Aid
06/14/01	\$502.00	Reading Terminal

5. On or about the dates listed below, defendant SARAH CONNOLLY fraudulently used “T.B.’s” FUNB debit card to purchase food, clothing, jewelry, and other items, totaling approximately \$456.98:

<u>Date</u>	<u>Amount</u>	<u>Location</u>
02/14/00	\$72.72	John Yi Seafood - Philadelphia
04/07/00	\$151.08	Urban Outfitters - Philadelphia
06/10/01	\$47.68	Strawbridges - King of Prussia
06/10/01	\$185.50	Strawbridges - King of Prussia

6. In an effort to conceal the fraudulent withdrawals from the FUNB CAP account of “T.B.” defendant SARAH CONNOLLY caused the “T.B.” CAP account to be inflated by the use of unauthorized withdrawals from “T.B.’s” Commerce Bank checking account and other FUNB customer accounts.

7. On or about the dated listed below, defendant SARAH CONNOLLY fraudulently deposited checks drawn on the account of “T.B.” at Commerce Bank and caused those checks to be deposited for credit on the FUNB CAP account of “T.B.,” totaling approximately \$17,000:

<u>Check No.</u>	<u>Date of Check</u>	<u>Amount</u>
No. 538	02/04/01	\$4,000.00
No. 539	03/01/01	\$7,000.00
No. 540	04/20/01	\$2,000.00
No. 541	05/01/01	\$3,000.00
No. 542	05/02/01	\$1,000.00

8. On or about May 25, 2001, defendant SARAH CONNOLLY made an unauthorized withdrawal from the FUNB trust account of "A.G.P." in the form of a bank check no. 46880943 made payable to "T. K." in the amount of \$2,500.

9. On or about May 31, 2001, defendant SARAH CONNOLLY forged the endorsements on the back of the bank check no. 46880943 and fraudulently deposited the check into the FUNB CAP account of "T.B."

10. On or about June 11, 2001, defendant SARAH CONNOLLY fraudulently deposited into the "T.B." CAP account, a check no. 503 drawn on the FUNB checking account of "M. L. B." dated June 11, 2001, in the amount of \$2,000 made payable to "T. K. B."

In violation of Title 18, United States Code, Section 656.

COUNT THREE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein.

2. From on or about December 13, 2000, to on or about February 7, 2001, in the Eastern District of Pennsylvania and elsewhere, defendant

**SARAH CONNOLLY,
a/k/a “Sarah Jane Raup Connolly Noll”**

being an employee of FUNB, the accounts of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869-9, did knowingly embezzle, abstract, purloin, and willfully misapply approximately \$5,000.00 of funds and monies intrusted to the custody and care of FUNB.

3. Defendant SARAH CONNOLLY attempted to conceal the fraudulent withdrawals from the “T.B.” Commerce Bank checking account by the use of an unauthorized withdrawal from the FUNB trust account of “M.S.” into the “T.B.” Commerce Bank checking account.

4. On or about December 13, 2000, defendant SARAH CONNOLLY fraudulently withdrew money from the FUNB trust account of “M.S.” in the form of a FUNB bank check no. 46601673 dated December 13, 2000, payable to “R.B., P.A.” in the amount of \$5,000.

5. On or about February 7, 2001, defendant SARAH CONNOLLY fraudulently deposited in the "T.B." Commerce Bank checking account a FUNB bank check no. 46601673 dated December 13, 2000, payable to "R. B., P.A." in the amount of \$5,000.

In violation of Title 18, United States Code, Section 656.

COUNT FOUR

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 1 and 2 of Count One are incorporated herein.
2. From on or about October 6, 2000, to on or about June 6, 2001, in the Eastern District of Pennsylvania and elsewhere, defendant

**SARAH CONNOLLY,
a/k/a “Sarah Jane Raup Connolly Noll”**

being an employee of FUNB, the accounts of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869-9, did knowingly embezzle, abstract, purloin, and willfully misapply approximately \$6,096.08 of funds and monies intrusted to the custody and care of FUNB.

3. Defendant SARAH CONNOLLY attempted to steal approximately \$2,410.50 by her fraudulent use of a FUNB VISA credit card issued to “N. P. S.” to purchase clothing, jewelry and other items for her personal use.

4. On or about the dates listed below, defendant SARAH CONNOLLY fraudulently used a FUNB VISA credit card issued to “N. P. S.” to make unauthorized purchases of clothing and other items totaling approximately \$2,410.50:

Transaction Date	Posting Date	Description	Amount
10/06/00	10/06/00	Hecht's Jones New York Philadelphia, PA	\$182.23
11/19/00	11/19/00	Hecht's Lauren Sports Wilmington, DE	\$357.00

01/04/01	01/04/01	Lord & Taylor Rena Rowan Philadelphia, PA	\$332.59
02/16/01	02/16/01	Lord & Taylor Carolee Jewel Philadelphia, PA	\$62.06
02/16/01	02/16/01	Lord & Taylor Rena Rowan Philadelphia, PA	\$250.33
02/16/01	02/16/01	Lord & Taylor Shalimar / Sam Philadelphia, PA	\$44.94
03/23/01	03/23/01	Hecht's Ladies Better Philadelphia, PA	\$375.93
04/09/01	04/09/01	Lord & Taylor DKNY Jr. Philadelphia, PA	\$235.96
04/13/01	04/13/01	Hecht's Better Handbag Philadelphia, PA	\$54.56
04/13/01	04/13/01	Hecht's Better Handbag Philadelphia, PA	\$52.49
04/23/01	04/23/01	Hecht's Lizwear Fashion Philadelphia, PA	\$49.99
04/23/01	04/23/01	Hecht's Lizwear Fashion Philadelphia, PA	\$187.96
05/02/01	05/02/01	Hecht's Mens Hilfiger Philadelphia, PA	\$119.48

05/02/01	05/02/01	Hecht's Better Neckwear Philadelphia, PA	\$62.49
05/02/01	05/04/01	Hecht's Trad Womens Philadelphia, PA	\$42.49

5. On or about the dates listed below, defendant SARAH CONNOLLY made payments on the FUNB VISA account referred to in paragraph 4 above by making unauthorized withdrawals from the FUNB trust accounts and checking accounts of various customers, totaling approximately \$3,685.58:

Payment Date	Type of Payment Transaction	Type of Account	Amount
11/13/00	FUNB Bank Check No. 46539736	"J.T.S." FUNB trust account	\$236.24
12/12/00	Payment transfer	"N.P.S." FUNB trust account	\$357.00
02/09/01	Payment Transfer	"N.P.S." FUNB trust account	\$332.59
03/09/01	Payment Transfer	"N.P.S." FUNB trust account	\$357.33
04/13/01	Check No. 501	"M.B." FUNB checking account	\$600.00
05/21/01	Payment Transfer	"N.P.S." FUNB trust account	\$356.89
05/14/01	Payment Transfer	"N.P.S." FUNB trust account	\$745.53
06/06/01	Check No. 502	"M.B." FUNB checking account	\$700.00

In violation of Title 18, United States Code, Section 656.

PATRICK L. MEEHAN
UNITED STATES ATTORNEY